

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DANIEL GORDON, et al.

Plaintiffs,

v.

AMADEUS IT GROUP, S.A., et al.,

Defendants.

Civ. A. No. 1:15-cv-05457 (KPF)

ECF Case

**MOTION FOR CERTIFICATION OF A SETTLEMENT CLASS AND  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT WITH  
DEFENDANTS AMADEUS IT GROUP, S.A., AMADEUS NORTH AMERICA, INC.,  
AND AMADEUS AMERICAS, INC.**

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs hereby move this Court for entry of an order certifying a settlement class, granting preliminary approval of a settlement with Defendants Amadeus IT Group, S.A., Amadeus North America, Inc., and Amadeus Americas, Inc., appointing settlement class counsel, approving the proposed notice plan, and setting a hearing for final approval of the settlement. The specific grounds for this motion are set forth more fully in the memorandum filed by Plaintiffs contemporaneously herewith.

Dated: July 23, 2018

Respectfully submitted,

/s/ Robert G. Eisler

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**CERTIFICATE OF SERVICE**

I, Robert G. Eisler, hereby certify that on July 23, 2018, I caused the foregoing Plaintiffs' Motion for Certification of a Settlement Class and Preliminary Approval of Class Action Settlement with Defendants Amadeus IT Group, S.A., Amadeus North America, Inc., and Amadeus Americas, Inc. to be filed and served electronically upon all counsel of record via this Court's CM/ECF system.

Dated: July 23, 2018

/s/ Robert G. Eisler  
Robert G. Eisler (Bar #RE1398)